



301335

**CONESTOGA-ROVERS
& ASSOCIATES**8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
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MEMORANDUM

TO: Ms. Sharon Newlon

REF. NO.: 042192-03

FROM: Garth Daley/lg/133

DATE: December 19, 2007

C.C.: RRG/Clayton Site Technical Committee
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Status Report # 26 for the Resource Recovery Group/Clayton Chemical Company Site

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated Federal On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this twenty-sixth Monthly Status Report is November 26, 2007, through December 14, 2007.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (The Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 25 was submitted to U.S. EPA on November 30, 2007.

1.0 COMPLETED ACTIVITIES

1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE

Activities performed during the reporting period were primarily related to the submission of Status Report # 25, and the completion of the proposed trench grouting and fence installation activities. Additional details of the completed tasks are provided for review in this report, as well as in select attachments to this report.

A discussion of the weekly activities appears below:

- During the week of November 26, 2007 (November 26 – 30, 2007), the primary activities that were performed centered on the development of Status Report # 25 (submitted on November 30, 2007), and the attempted scheduling of the proposed trench grouting and fence replacement activities for the week of December 3, 2007. No Site visits were completed during the week of November 26, 2007;
- The key activities completed during the week of December 3, 2007 involved the coordination of the contractors for completing the planned trench grouting and fence installation activities for the week of December 10, 2007. No Site visits were initiated during the week of December 3, 2007; and
- For the week of December 10, 2007, the Site-related activities primarily involved the grouting of the former railroad maintenance trench at the northeast quadrant of the Site, and the replacement of the fencing along the southern Site boundary.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for November 26 – 30, 2007; Appendix B – Weekly Summary of Site Activities for December 3 – 7, 2007; Appendix C – Weekly Summary of Site Activities for December 10 – 14, 2007; Appendix D – Preliminary Analytical Results for the December 10, 2007, soil sample; and Appendix E – Preliminary Analytical Results for the December 10, 2007, liquid sample.

1.2 SAMPLING AND ANALYSIS

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action as requested by The Respondents. This request was approved by OSC Turner on April 20, 2006. However, TEK-Lab, Inc. of Collinsville, Illinois (TEK-Lab) has been used for the performance of waste characterization sample analysis to assist with/complete waste disposal activities.

On December 10, 2007, CRA collected a 4-point composite soil sample from the stockpile created during the June 2007 investigation of the former railroad maintenance trench. Also, a multi-location liquid sample was collected from the liquids identified in the trench on December 10, 2007.

Both samples were analyzed for typical waste characterization parameters, such as Toxicity Characteristic Leaching Procedures (TCLP) metals, TCLP Volatile Organic Compounds (VOCs), TCLP Semivolatile Organic Compounds (SVOCs), reactivity to various compounds, and pH. The finalized Analytical Reports for the samples were received on Friday, December 14, 2007. Copies of these reports are included as Appendix D (soil sample) and Appendix E (liquid sample) of this report, respectively.

1.3 REMOVAL ACTION WORK

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through C of this report.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

It should be noted that the liquid sample collected on December 10, 2007 was a two-phase sample with distinct water and oil layers. During the sample analysis process, the laboratory was unable to maintain a proportional emulsion for analysis. The laboratory was directed to analyze the oil layer, as that was assumed to represent the "worst case disposal" scenario. Subsequently, the analytical results being provided in this report are actually from the oil portion of the sample. No other significant technical problems were encountered during the reporting period.

Similarly, no technical problems or issues are anticipated for the upcoming period.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

As stated in Section 1.2, analytical data were received during the reporting period for the soil and liquid samples collected on December 10, 2007. The resultant analytical reports, which were received on December 14, 2007, are included as Appendix D and Appendix E, respectively.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD**4.1 SITE PLANS**

During the upcoming reporting period (December 17, 2007 through January 25, 2008), the following activities are anticipated:

- Oversight of the disposal of the soil stockpile generated from the investigation of the former railroad maintenance trench;
- Oversight of the disposal of the liquids removed from the former railroad maintenance trench during the week of December 10 - 14, 2007;
- Oversight of the disposal of the non-hazardous debris generated during the Site cleanup activities completed during the week of December 10 - 14, 2007;
- Installation of additional chain-link fencing along the south Site border; and
- Coordination and completion of the groundwater monitoring/sampling event requested on behalf of Pharmacia/Solutia.

4.2 SAMPLING AND ANALYSIS

As a result of Site/well access questions, the proposed groundwater sampling event that was discussed in Status Report #23 had been postponed. The Respondents were provided with a copy of a Site Access Agreement, and proposed sample locations by a representative of Pharmacia/Solutia. Subsequently, The Respondents informed U.S. EPA/OSC Turner of the proposal, and U.S. EPA has consented to the sampling event. CRA will provide oversight of this sampling event on behalf of The Respondents, as well as collect sample splits. This event is tentatively scheduled to be completed in January of 2008. Additional details will be provided to U.S. EPA upon confirmation.

The analytical results from the CRA-collected samples from this sample event should be received within 14 days of the completion of the sampling activities.

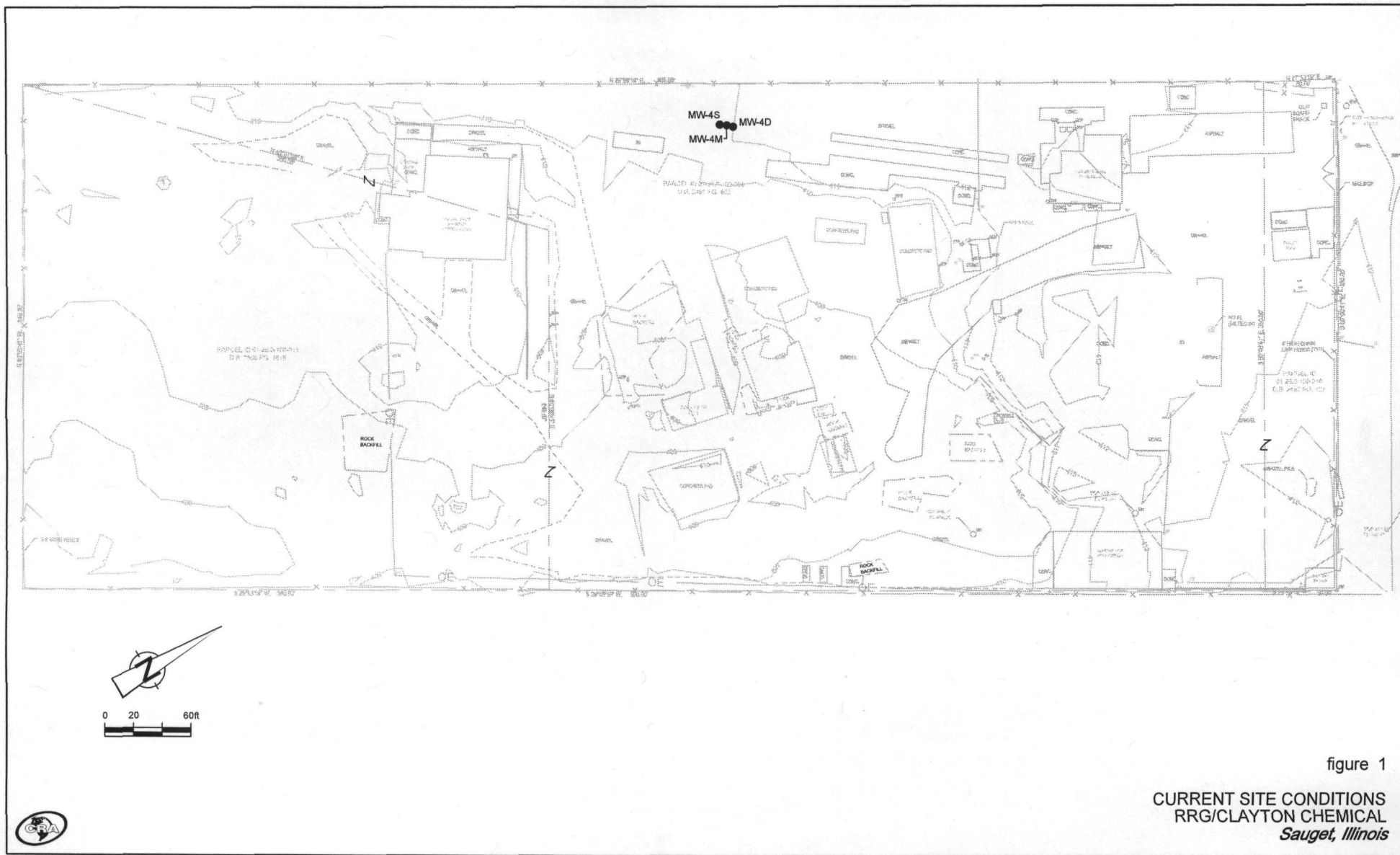
4.3 REMOVAL ACTION WORK

Among the activities expected to be performed and/or completed during the upcoming report period are the disposal of the soil stockpile related to the June 2007 liquids removal actions; the disposal of the liquids recovered from the former railroad maintenance trench for the grouting activities; the collection of groundwater samples from the wells installed at the Site; and the completion of additional chain link fencing along the south property boundary. An anticipated schedule for these activities appears below.

5.0 ANTICIPATED SCHEDULE

Please note that the dates presented below are projected dates and may be modified based on personnel availability, weather conditions or other factors. The Respondents will contact U.S. EPA prior to the initiation of all on-Site activities, or regarding any delays in the project timeline that would affect the ability of U.S. EPA or U.S. EPA designated personnel to perform oversight activities at the RRG/Clayton Site.

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Continue Stormwater Control Measures	As needed/ongoing	December 17, 2007
Oversee the Off-Site Disposal of the Liquids and Soils Associated With the Completed Trench Activities	Ongoing/30 days	December 21, 2007
Complete Fence Installation Activities	3 - 5 days	January 7, 2008
Initiate Groundwater Sampling Activities	3 - 5 days	January 7, 2008
Submit Status Report # 27	1 day	January 31, 2008
Attachments		



APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR NOVEMBER 26 -30, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/lg/130 DATE: December 17, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For November 26 -30, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities were completed in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the one hundred and fourth week (the period November 26 through 30, 2007) is presented below.

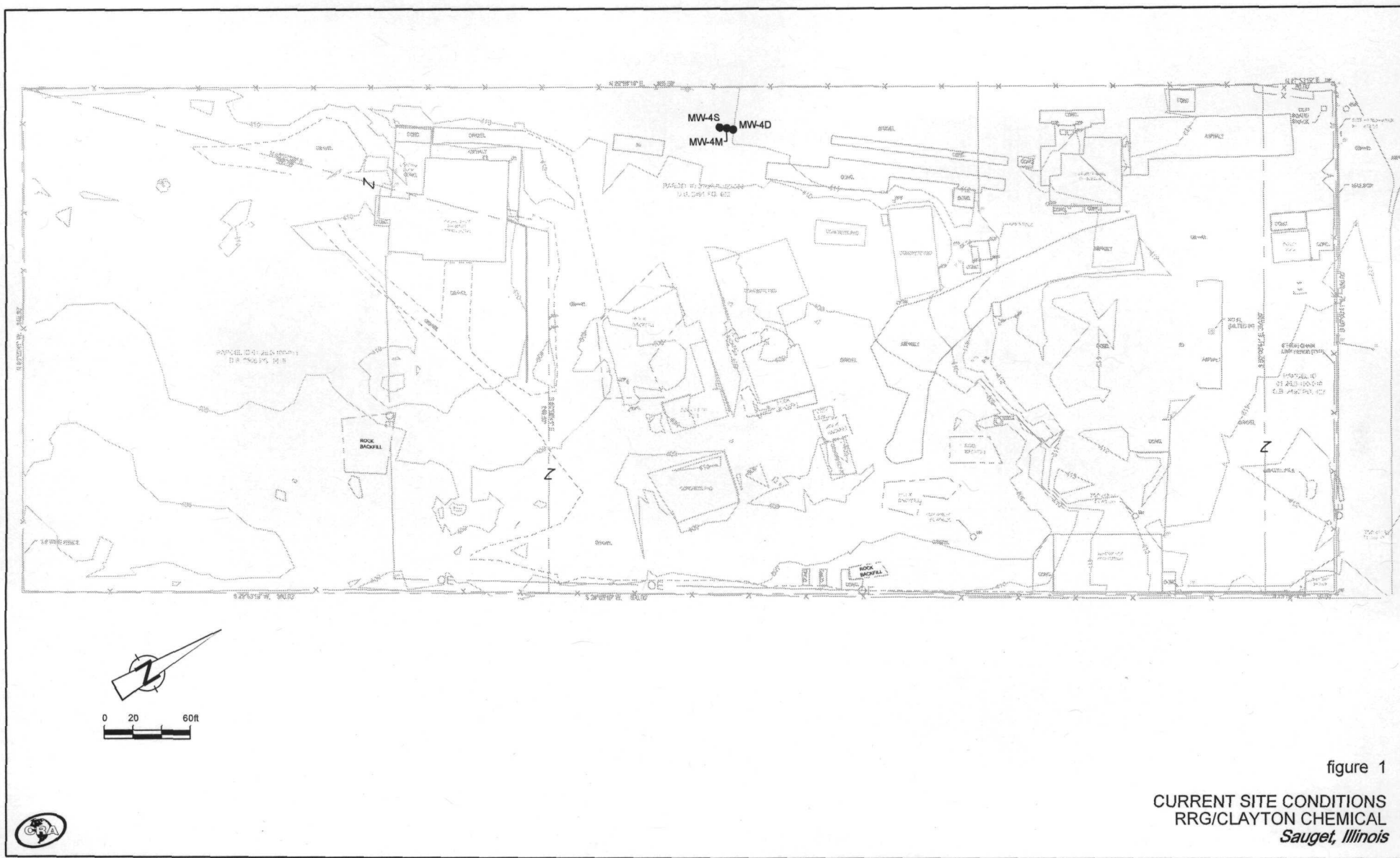
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Nov. 26, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/ Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Nov. 27, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Nov. 27, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents were informed by OSC Kevin Turner that he was available to observe trench-related activities at the Site during the first 3 weeks of December. The Respondents subsequently told OSC Turner that the expected mobilization date would be December 3 rd
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Nov. 28, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Nov. 29, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Nov. 29, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents informed OSC Turner that the planned trench grouting activities were being postponed until the week of December 10 th
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Nov. 30, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. OSC Turner contacted The Respondents and told them that the proposed December 10 th remobilization date for the trench grouting activities was acceptable. The Respondents submitted Status Report # 25 to U.S. EPA/OSC Turner
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment



APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR DECEMBER 3 - 7, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

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www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/Ig/131 DATE: December 17, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For December 3 -7, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities were completed in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the one hundred and fifth week (the period December 3 through 7, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 3, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/ Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 4, 2007	Mobilization Activities	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 4, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 5, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents provided U.S. EPA/OSC Kevin Turner with the proposed activity schedule for the week of December 10 th
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 6, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 6, 2007	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity
Dec. 7, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	No activity

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

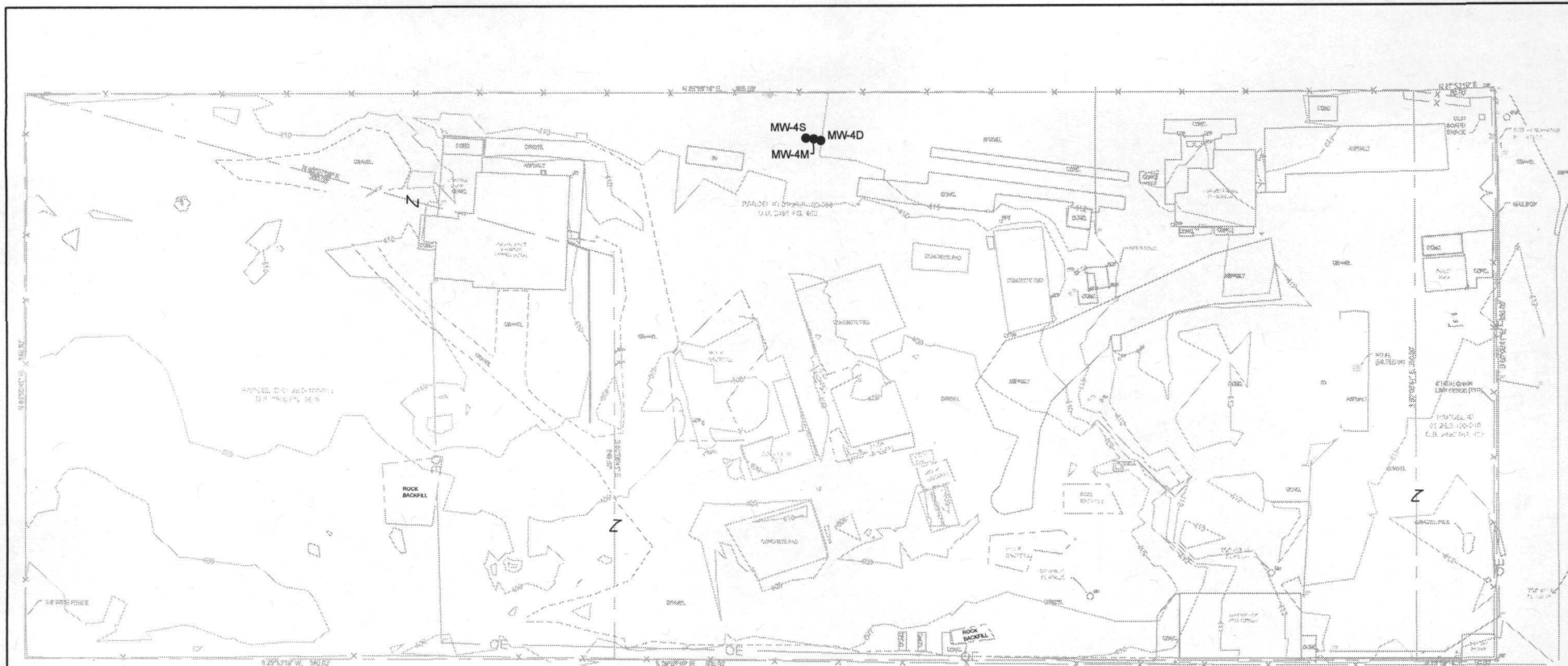


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR DECEMBER 10 - 14, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/132 DATE: December 20, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
P. Pathak

RE: Weekly Summary Of Site Activities For December 10 -14, 2007

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities were completed in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the one hundred and sixth week (the period December 10 through 14, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 10, 2007	Mobilization Activities	Conestoga-Rovers & Associates (CRA) and Brandenburg Industrial Service Company (Brandenburg) personnel mobilized to the Site. A Caterpillar CAT 267 skid-steer loader and a portable generator were delivered. Veolia delivered 30 55-gallon steel drums to the Site. Brandenburg also bought a sump pump and plastic sheeting for liquid removal activities
	Project Coordination	START Tom Binz was on Site to observe Site activities
	Site Preparation	Brandenburg exposed the trench openings to determine if any liquids were present. Upon confirming the presence of liquids, the openings were secured. Brandenburg also completed clearing vegetation along the south fence line
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 10, 2007	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	CRA collected a liquid sample from the former railroad maintenance trench and a soil sample from the stockpile created during the trench investigation in June 2007. Both samples were taken to TEK-Lab for waste characterization analysis
Dec. 11, 2007	Mobilization Activities	Veolia delivered 20 55-gallon steel drums
	Project Coordination	START Tom Binz was on Site to observe Site activities. IEPA Mike Grant visited the Site
	Site Preparation	Brandenburg prepared the trench area openings for liquid removal by installing plastic sheeting around each opening
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	Brandenburg pumped roughly 1,650 gallons of liquids from the trench into 30 drums. The drums were subsequently staged on the tank base for the former G8 tank
Dec. 12, 2007	Mobilization Activities	A total of 21 cubic yards (yd ³) of pumpable grout was delivered to the Site
	Project Coordination	START Tom Binz, IEPA Mike Grant and OSC Kevin Turner were on Site to observe Site activities
	Site Preparation	Brandenburg began debris assembly activities
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 12, 2007	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	Approximately 13 yd ³ (2,600 gallons) of pumpable grout were added to the former railroad maintenance trench used for the activity. Brandenburg pumped roughly 450 gallons of liquids from the trench into 10 drums for a total of 40 drums (roughly 2,100 gallons). START Binz and IEPA Grant discovered a partially collapsed stormwater manhole near the former warehouse foundation
Dec. 13, 2007	Mobilization Activities	Fencing hardware (38 fence posts, 350 feet of top rail and associated connectors) were brought on Site for the fence installation activities. 16 tons (roughly 9.5 yd ³) of pea gravel were delivered to the Site
	Project Coordination	START Tom Binz was on Site to observe Site activities. The Respondents informed U.S. EPA/OSC Turner that the collapsed stormwater manhole was backfilled
	Site Preparation	Brandenburg continued debris assembly activities. Brandenburg also relocated the 40-yd ³ roll off box to the northeast quadrant of the Site
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 13, 2007	Miscellaneous	Installation of the replacement fence along the south Site boundary was initiated. The partially collapsed stormwater manhole was filled to ground surface using roughly 4.5 yd ³ of pea gravel. Brandenburg began Site wide debris consolidation in preparation for demobilization
Dec. 14, 2007	Mobilization Activities	Chain link fencing, barbed wire and associated hardware were delivered to the Site. Veolia delivered a roll off box to the Site to accommodate the possible loading of the trench area soils. Brandenburg and CRA personnel demobilized from the Site. CRA demobilized office supplies and equipment from the Site
	Project Coordination	START Tom Binz was on Site to observe Site activities
	Site Preparation	Brandenburg completed debris assembly activities
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off Site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. Tank removal/disposal activities were completed on March 30, 2007
	Drum Characterization/Disposal	No on Site activity. Drum shipment activities were completed on March 30, 2007
	Piping Draining/ Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off Site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity. Soil removal and area restoration activities were completed on February 7, 2007
	Miscellaneous	The installation of the replacement fence along the south Site boundary (roughly 350 feet) was completed. Analytical results were received for the soil and liquid samples collected on December 10 th . Summary tables of these results are included for review. Brandenburg placed the soil stockpile from the trench investigation activities into the 40-yd ³ roll off box for future off-Site disposal as non-hazardous waste. The roll off box was subsequently secured with plastic sheeting to prevent stormwater and/or snowfall intrusion

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9239 or 708-203-8672), or Phil Harvey (773-380-9246) for clarification.

Attachment

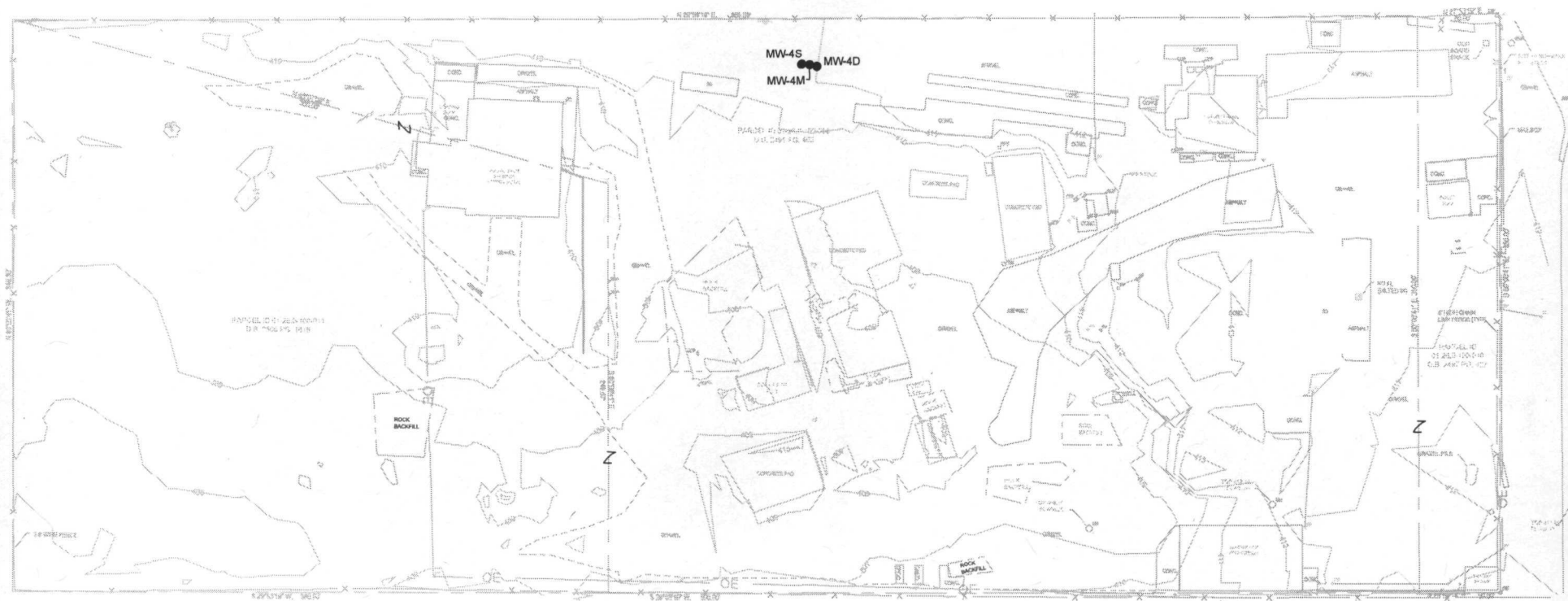


figure 1

CURRENT SITE CONDITIONS
RRG/CLAYTON CHEMICAL
Sauget, Illinois



RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE		
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS		
LIQUID TRENCH SAMPLE ANALYSIS		
	RCRA Toxic Concentration/TSCA Threshold	
Sample Date		12/10/2007
Sample Time		1545
Sample ID		OIL-121007-GD-003
No. of Sample Aliquots		9
Parameter		
TCLP Metals		
Arsenic	5.0	< 0.250
Barium	100.0	0.045
Cadmium	1.0	< 0.02
Chromium	5.0	< 0.1
Lead	5.0	< 0.4
Selenium	1.0	< 0.5
Silver	5.0	< 0.1
Mercury	0.2	<0.002
PCBs		
Aroclor 1016		322
Aroclor 1221		ND
Aroclor 1232		ND
Aroclor 1242		ND
Aroclor 1248		ND
Aroclor 1254		1110
Aroclor 1260		872
Total	50.0	2304

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE		
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS		
LIQUID TRENCH SAMPLE ANALYSIS		
	RCRA Toxic Concentration/TSCA Threshold	
Sample Date		12/10/2007
Sample Time		1545
Sample ID		OIL-121007-GD-003
No. of Sample Aliquots		9
TCLP SEMIVOLATILE ORGANIC COMPOUNDS		
2,4,5-Trichlorophenol	400.0	ND
2,4,6-Trichlorophenol	2.0	ND
2,4-Dinitrotoluene	0.13	ND
Cresols, Total		0.693
2-Methylphenol	200.0	NA
3/4 Methylphenol	400.0	NA
Hexachlorobenzene	0.13	ND
Hexachlorobutadiene	0.5	ND
Hexachloroethane	3.0	ND
m, p-Cresol		0.630
Nitrobenzene	2.0	ND
o-Cresol		0.064
Pentachlorophenol	100.0	ND
Pyridine	5.0	ND

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE		
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS		
LIQUID TRENCH SAMPLE ANALYSIS		
	RCRA Toxic Concentration/TSCA Threshold	
Sample Date		12/10/2007
Sample Time		1545
Sample ID		OIL-121007-GD-003
No. of Sample Aliquots		9
TCLP VOLATILE ORGANIC COMPOUNDS		
1,1-Dichloroethene	1.7	ND
1,2-Dichloroethane	0.5	ND
1,4-Dichlorobenzene	7.5	0.11
2-Butanone		ND
Benzene	0.5	0.244
Carbon Tetrachloride	0.5	ND
Chlorobenzene	100.0	ND
Chloroform	6.0	ND
Methyl ethyl ketone	200.0	NA
Tetrachloroethene	0.7	ND
Trichloroethene	0.5	ND
Vinyl chloride	0.2	0.667
GENERAL CHEMISTRY		
Cyanide		0.52
Reactive Sulfide		< 9.9
Phenolics		24.5
Paint Filter Test		FAIL
pH		5.97
Ignitibility	> 140 degrees Fahrenheit	187.0
Extractable Organic Halides		NA
Percent Moisture		NA

Notes:

1. All concentrations are reported in parts per million.
2. Analytical data shown is being evaluated against the RCRA Toxicity thresholds, AND TSCA threshold value
3. Evaluation standards (column B) are bolded for emphasis.
4. A blank in column B indicates that no evaluation threshold was found.
5. Bolded cells represent data that exceeded the applicable evaluation threshold value.
6. NA means data was not analyzed for.
7. ND means the analyte was not detected.

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE		
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS		
LIQUID TRENCH SOIL ANALYSIS		
	RCRA Toxic Concentration/TSCA Threshold	
Sample Date		12/10/2007
Sample Time		1600
Stockpile #		S-121007-GD-029
Sample ID		
No. of Sample Aliquots		4
Parameter		
TCLP Metals		
Arsenic	5.0	<0.25
Barium	100.0	0.627
Cadmium	1.0	0.026
Chromium	5.0	0.112
Lead	5.0	0.21
Selenium	1.0	<0.500
Silver	5.0	<0.100
Mercury	0.2	<0.0002
PCBs		
Aroclor 1016		1.03
Aroclor 1221		ND
Aroclor 1232		ND
Aroclor 1242		ND
Aroclor 1248		ND
Aroclor 1254		5.01
Aroclor 1260		4.05
Total	50.0	10.09

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE		
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS		
LIQUID TRENCH SOIL ANALYSIS		
	RCRA Toxic Concentration/TSCA Threshold	
Sample Date		12/10/2007
Sample Time		1600
Stockpile #		S-121007-GD-029
Sample ID		
No. of Sample Aliquots		4
TCLP SEMIVOLATILE ORGANIC COMPOUNDS		
2,4,5-Trichlorophenol	400.0	ND
2,4,6-Trichlorophenol	2.0	ND
2,4-Dinitrotoluene	0.13	ND
Cresols, Total	200	ND
o-Cresol	200	ND
2-Methylphenol	200.0	NA
3/4 Methylphenol	400.0	NA
Hexachlorobenzene	0.13	ND
Hexachlorobutadiene	0.5	ND
Hexachloroethane	3.0	ND
Nitrobenzene	2.0	ND
Pentachlorophenol	100.0	ND
Pyridine	5.0	ND
TCLP VOLATILE ORGANIC COMPOUNDS		
1,1-Dichloroethene	1.7	ND
1,2-Dichloroethane	0.5	ND
1,4-Dichlorobenzene	7.5	ND
2-Butone		ND
Benzene	0.5	ND

RESOURCE RECOVERY GROUP/CLAYTON CHEMICAL COMPANY (RRG/CLAYTON) SITE		
SOLIDS REMOVAL ACTION ANALYTICAL RESULTS		
LIQUID TRENCH SOIL ANALYSIS		
	RCRA Toxic Concentration/TSCA Threshold	
Sample Date		12/10/2007
Sample Time		1600
Stockpile #		S-121007-GD-029
Sample ID		
No. of Sample Aliquots		4
Carbon Tetrachloride	0.5	ND
Chlorobenzene	100.0	ND
Chloroform	6.0	ND
Methyl ethyl ketone	200.0	NA
Tetrachloroethene	0.7	ND
Trichloroethene	0.5	ND
Vinyl chloride	0.2	ND
GENERAL CHEMISTRY		
Reactive Cyanide		1.5
Reactive Sulfide		<9.9
Phenolics		1.4
Paint Filter Test		FAIL
pH		7.6
Ignitibility	>200	> 200
Extractable Organic Halides		< 10.0
Percent Solids		99

Notes:

1. All concentrations are reported in parts per million.
2. Analytical data shown is from sample collected for waste characterization.
3. Analytical data shown is being evaluated against the RCRA Toxicity thresholds, and TSCA threshold value.
4. Evaluation standards (column B) are bolded for emphasis.
5. A blank in column B indicates that no evaluation threshold was found.
6. Bolded cells represent data that exceeded the applicable evaluation threshold value.
7. NA means data was not analyzed for.
8. Blank cells means data was neither requested nor reported.
9. ND means the analyte was not detected.

APPENDIX D

ANALYTICAL RESULTS FOR DECEMBER 10, 2007 SOIL SAMPLE

APPENDIX E

ANALYTICAL RESULTS FOR DECEMBER 10, 2007 LIQUID SAMPLE